

REMARKS**I. Status of the Claims:**

Claims 1-34 and 41-52 are currently pending.

By this Amendment, claims 21-22 have been canceled without prejudice or disclaimer. No new matter has been added by this amendment.

Upon entry of the Amendment, claims 1-20, 23-34 and 41-52 would be pending.

II. Rejection Under 35 U.S.C. §§102 and 103:

Claims 1, 3-10, 49, and 11, 13-20, 52 have been rejected under 35 U.S.C. §102(b) as being anticipated by Sergeant et al. (U.S. Patent No. 5,517,236). Claims 2, 12, 21-22, 47-52 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Sergeant and further in view of WebCam⁺ and RFC 1866 “Hypertext Markup Language – 2.0” and RFC 1738 “Uniform Resource Locators (URL).” Claims 23-34, 41-46 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Blackshear (U.S. Patent No. 5,111,288) and further in view of WebCam⁺, and Niwa (U.S. Patent No. 5,544,046).

1. CLAIMS 1 AND 11:

Claims 1 and 11 are directed to an arrangement in which both a network address of a site and control information for respective image input means of a site are stored. The stored network address and control information are read. The designated site is accessed using the read address and is controlled control using the read control information.

That is, prior to access and control of the designated site, network address and control information are stored and subsequently read for use in access and control operation.

Thus, when the claims are read as a whole, it is apparent that the storing of network address and control information and the reading thereof are not performed locally at the designated site.

Sergeant does not disclose or suggest that the control information is not stored locally at the site. Instead, the Sergeant system maintains control information locally at each surveillance unit for subsequent implementation. The Examiner appears to agree with the arguments, but asserts that the claims do not include such a limitation. However, as discussed above, when the claims are read as a whole, it is apparent that claims 1 and 11 involve storing and reading of control information remote from the designated site.

Accordingly, Sergeant does not disclose or suggest the claimed combination of storing network address and control information for a site, reading the address and associated control information, and then accessing and controlling the site according to the stored and read address and associated control information. Thus, claims 1 and 11 and their dependent claims are not anticipated by Sergeant and are patentably distinguishable over the same.

As to the Examiner's response to Applicants' arguments set forth on page 2 of the Office Action (which allege obviousness of these claims in further view of bookmark or shortcut), Applicants note that claims 1 and 11 have only been rejected under section 102 as being anticipated by Sergeant and not under section 103. See Office Action, page 5. Thus, these allegations are non-responsive to Applicants' prior arguments rebutting the outstanding rejection solely under section 102.

2. CLAIMS 23, 30 AND 31:

Independent claims 23, 30 and 31 are directed to an arrangement involving transferring image information with information indicative of a service allowable range of the camera based on a received request.

Applicants respectfully submit that the cited references disclose or suggest information indicative of a service allowable range. Blackshear and WebCam+ do not disclose or suggest any information indicative of a service allowable range of a camera or any transfer thereof. Niwa is directed to a numerical controller unit for controlling a machining process, which is simply different from the camera control arrangement of the claimed inventions. In Niwa, an operator may provide memo data to define tolerance limits (e.g., an upper and lower limit) for particular data which is employed by a machining program to perform a machining process. The tolerance limits are simply not information indicative of a service allowable range of a camera. Thus, the cited references, individually or in combination, do not disclose or suggest any information indicative of a service allowable range of a camera.

The cited references are also silent as to the transfer of image information with information indicative of a service allowable range of a camera based on a received request. The Examiner now relies on Blackshear as remedying the deficiencies of the other cited references as to this transfer feature. See Office Action, page 3. However, Blackshear simply describes display of image signals and status information (e.g., GOING TO PRESHOT, etc.). The status information is simply not information indicative of a service allowable range of a camera. The Examiner's rationale set forth on page 3 for combining the references to read on the transfer feature is simply conclusory and subjective based on an arbitrary piecemeal reading of the cited

references. It is apparent that absent impermissible hindsight, one of ordinary skill in the art would not combine the references in the manner suggested by the Examiner.

Thus, the references, individually or in combination, still do not disclose or suggest the transfer of image information with information indicative of a service allowable range of a camera based on a received request.

In view of the foregoing, claims 23, 30 and 31 are believed to be patentably distinguishable over the cited references.

3. CLAIMS 32, 33 AND 34:

Claims 32, 33 and 34 are directed to an arrangement involving comparing information indicative of the operable limitation of the camera transferred from the server based on a request and notifying the result of the comparison. The comparison is not performed by the server, but rather at a remote location.

For similar reasons as discussed above for claims 23 and 31, the cited references do not disclose or suggest any information indicative of the operable limitation of a camera or the transfer thereof.

The Examiner also asserts that:

Regarding claims 32, 33 and 34, the references teach comparing the value input by the user with the operable range of the device prior to sending the command to the device [see Niwa's fig. 49 and Blackshear's fig. 9]. Hence, it is apparent that the system as modified would check for valid parameters at the client prior to sending it over the network to the camera. See Office Action, pages 3 and 4.

However, Niwa simply shows a numerical controller arrangement which is simply different than the claimed environment with a client, server, camera and general network. The Examiner has not addressed with reasonable particularity what is alleged as the client or server in Niwa and

which systems or components perform processes described in Fig. 49. Blackshear (e.g., Fig. 9) describes processes performed by a program within the on-board computer that controls the camera functions through the electronic control circuit and not within a “client”. See col. 9, lines 31-35. Thus, the Examiner’s allegations are further based upon unsupported assumptions. Accordingly, these claims are patentably distinguishable over the cited references.

4. CLAIM 21:

Claims 21 and 22 have been canceled without prejudice, thereby rendering the rejection of these claims moot.

5. DEPENDENT CLAIMS 47, 48, 50 and 51:

Dependent claims 47, 48, 50 and 51 each recite one of the following: (1) the identifier is expressed as part of a path name in the URL, or (2) the identifier is expressed as part of a resource name in the path name in the URL. As noted in the base claims, the identifier identifies an item to be controlled by said image input means.

The Examiner asserts that these limitations are inherently taught by the references RFC 1866 and RFC 1738. However, RFC 1866, as relied upon by the Examiner, simply discusses a GET method in which a form data set is appended to the action URL. See RFC 1866, pages 46-47. The appended data set is not part of the path name of the URL or the resource name. In other words, the path or resource name or parts thereof are not employed as the claimed identifier for identifying the item to be controlled.

As to RFC 1738, the Examiner points to a general discussion of HTTP syntax and GOPHER URL syntax which do not disclose or suggest the identifier being expressed as part of

a path name or resource name in the URL. See RFC 1738, pages 9-10. In particular, the

Examiner alleges, in part, that:

Hence, it is inherent that a request submit from the browser to the WebCam+ would have the network address of the WebCam+ server in the "<host>:<port>" portion, and control information (i.e., identifiers and parameter values) in the "<path>?<searchpart>". Hence, the system as modified would have the identifier expressed part of the "resource name" as claimed. See Office Action, page 4.

However, the mere fact that request is submitted from the browser to WebCam+ does not make it inherent or necessary for an identifier for controlling an item by the image input means to be part of a pathname or resource name. For example, the control information may simply be appended to the URL string such as taught in RFC 1866 without being part of the pathname or resource name.

Further, although the URL syntax of RFC 1738 in section 3.3 may include a pathname and/or resource name, there is nothing in this section of RFC 1738 to support the Examiner's subjective classification of the entire <path>?<searchpart> fields as a resource name or pathname or that control information would be part of a pathname or resource name.

For these reasons, along with those set forth above for claims 1 and 11, these dependent claims are further distinguishable over the cited references.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

AUTHORIZATION

The Commissioner is hereby authorized to charge any additional fees which may be required for consideration of this Amendment to Deposit Account No. 13-4503, Order No. 1232-4367US1.

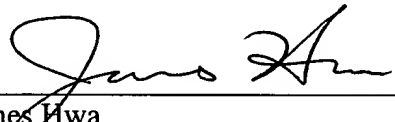
In the event that an extension of time is required, or which may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account No. 13-4503, Order No. 1232-4367US1.

Respectfully submitted,
MORGAN & FINNEGAN, L.L.P.

Dated: _____

6/7/04

By: _____


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